



U.S. Department of Justice
Tax Division
Civil Trial Section, Northern Region

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January 10, 2024

Via ECF

The Hon. Daniel J. Stewart, U.S.M.J.
James T. Foley U.S. Courthouse
445 Broadway - 4th Floor
Albany, NY 12207

Re: Status Report and Request to Extend Stay
United States v. Pioneer Bank, et al.
Case No. 1:20-cv-487-DNH-DJS (N.D.N.Y.)

Dear Judge Stewart:

Plaintiff United States of America and Defendants Pioneer Bank and Pioneer Bancorp, Inc. ("Defendants") (collectively, the "Parties") jointly submit this status report pursuant to the Court's November 15, 2023 Order (Doc. 51), and to jointly request a 45-day extension (to March 18, 2024) of the stay of all discovery deadlines.

On November 15, 2023, the Court entered an Order (Doc. 51) granting the Parties' joint motion to stay. The Parties had reported that they had reached advanced stages of settlement negotiations and expected to be working towards reaching a final agreement. (*See* Doc. 50.)

Since that time, the Parties have held additional telephonic and videoconference discussions, exchanged multiple, substantive emails discussing settlement terms, and exchanged drafts of documents necessary to finalize a settlement. The Parties report that they are close to the end of the process, and they expect to be finalizing settlement discussions and documents in the coming weeks, and then obtain necessary approvals. Accordingly, the Parties submit that good cause exists to extend the stay by 45 days.

If the Court grants the requested extension of the stay, the Parties will provide the Court with a joint status report on or before March 18, 2024.

Thank you for your consideration.

Respectfully submitted,

/s/ Joseph M. Kaufman

JOSEPH M. KAUFMAN

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U.S. Department of Justice, Tax Division

Civil Trial Section, Northern Region

*Attorney for Plaintiff United States of
America*

/s/ Robert J. Alessi (with consent)

Robert J. Alessi

DLA PIPER

*Attorney for Defendants Pioneer Bank and
Pioneer Bancorp, Inc.*